

INFORMATION PURSUANT TO ART. 13 OF REGULATION (EU) 679/2016 – VISITORS

1. Who is the Data Controller? How can they be contacted?

The Data Controller is **TÜV Rheinland Italia S.r.l. a sole shareholder company**, with registered office in Via Enrico Mattei 3, 20005 Pogliano Milanese (MI), Tax Code and VAT No. 12184570153, which can be contacted at the email address dpr@it.tuv.com ("Data Controller").

2. Who are the data subjects?

"Data subjects" are all natural persons who access, for any reason, the Data Controller's premises, including in particular:

- customers and potential customers;
- suppliers and consultants;
- auditors, inspectors, and technicians;
- candidates;
- any other visitor registered at reception.

3. What personal data or information do we collect and process?

The Data Controller processes only the personal data necessary for managing and controlling access to its premises, including:

- identification data (first name, last name);
- company/organization to which they belong;
- role or function, if applicable;
- identity document details (where required for security purposes);
- date and time of entry and exit;
- signature on electronic device to certify presence and acceptance of access and confidentiality rules.

In the event of a prior invitation to visit, the Data Controller may also process:

- professional contact details (e.g., email address);
- information relating to the organization of the meeting (date, internal contact person, purpose of the visit).

Important: The signature collected on the tablet constitutes a simple electronic signature and does not involve the collection of any biometric data (e.g., pressure, speed, tilt).

The data is processed in accordance with the principles of lawfulness, fairness, minimization, and proportionality.

4. Where does the personal data come from?

Personal data is provided:

- directly by the data subject when registering at reception or accessing the company premises;
- communicated to the Data Controller by the internal contact person who organizes the visit.

5. For what purposes do we process the data? What is the legal basis? How long do we keep it?

Purpose	Legal basis	Retention
Management and registration of access to company premises	Art. 6(1)(f) GDPR - Legitimate interest of the Data Controller to the safety of persons and company assets	Up to 6 (six) months from registration, except where required for legal protection
Protection of the rights of the Data Controller in the event of litigation or requests from the Authorities	Art. 6(1)(f) GDPR - Legitimate interest	For the duration of any dispute and within the applicable limitation periods
Organization and management of the invitation to visit	Art. 6(1)(f) GDPR - Legitimate interest of the Data Controller in the organization and security of access	Up to 6 (six) months from registration, except for legal protection requirements

6. Is the provision of data mandatory or optional?

The provision of data is necessary to allow access to company premises. Failure to provide such data may make it impossible to authorize entry.

7. Who is personal data disclosed to?

The personal data collected may be processed or disclosed to:

- authorized personnel of the Data Controller;
- TÜV Rheinland Group companies that support the Data Controller in system management, audit, or compliance activities;
- IT and cloud service providers and consultants appointed as Data Processors pursuant to Article 28 of the GDPR;
- authorities and entities to whom the data must be disclosed in compliance with regulatory obligations (e.g., judicial authorities, police);

8. Is the data transferred outside the European Union?

Yes, in some cases. The use of Group-wide shared platforms, such as SAP, Ariba, and cloud services, may involve transfers to third countries. The Data Controller ensures that such transfers are carried out in accordance with Articles 44–49 of the GDPR, through:

- Standard Contractual Clauses (SCC) of the European Commission,
- Appropriate technical and organizational protection measures;
- Any adequacy decisions by the European Commission, if applicable.

In particular, the Data Controller carries out appropriate assessments of the equivalence of the protection offered in the countries to which the data are transferred and adopts the SCCs and supplementary measures provided for by the applicable legislation. Upon request, the Data Controller may provide information on the safeguards adopted, within the limits of its confidentiality obligations.

9. How long do we keep the data?

Personal data is stored for the periods indicated in the table in Section 5. The period may be extended in the event of disputes, audits, or additional regulatory obligations. Once the storage period has expired, the data will be deleted.

10. What are the rights of data subjects?

Data subjects may exercise the rights provided for in Articles 15–22 of the GDPR, in particular:

1. Right of access
2. Right to rectification
3. Right to erasure
4. Right to restriction
5. Right to data portability
6. Right to object
7. Right not to be subject to automated decision-making (not applicable in the context of this policy).

Finally, we remind you that you always have the right to lodge a complaint with the Italian Data Protection Authority, located in Rome, Piazza Venezia 11, 00187 Rome, Tel. (+39) 06.696771, e-mail: protocollo@gpdp.it, certified e-mail: protocollo@pec.gpdp.it.

11. How can rights be exercised?

Requests can be sent directly to the Data Controller responsible for the individual contractual relationship by writing to dpr@it.tuv.com. The Data Controller will respond within 30 days, except for extensions permitted by the GDPR.

12. Can this policy be updated?

Yes. The policy may be modified to comply with regulatory, organizational, or technological changes. Updated versions will be made available through the Data Controller's institutional channels.